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November 11, 2022

**VIA DNJ ECF**

Hon. Leda Dunn Wettre  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, N.J. 07101

Re: *Sawhney v. Chubb Insurance Company of New Jersey*  
Docket No. 2:21-cv-14675-KSH-LDW

Your Honor:

This firm represents the plaintiffs in the above referenced insurance coverage litigation. We respectfully request a conference with the court for the purpose of scheduling depositions. I spoke with Chubb's counsel and was unsuccessful in moving the case forward with depositions. Chubb's counsel takes exception to objections I made to document discovery five months ago in which Chubb sought personal tax returns and other financial information from my clients that is patently irrelevant. I have spoken several times with Chubb's counsel about those objections and indeed we even mentioned it your honor in one of our previous conferences. Chubb has failed to bring any motion to date. Your Honor's order requires completion of discovery by January 31, 2023. I believe depositions are also required to have a meaningful mediation.

As to plaintiffs' current motion to quash, I am in the process of obtaining certifications from my clients to cure Chubb's "form over substance" objection. My clients are out of state at the moment, and I anticipate providing those affidavits and my letter reply next week.

Thank you for your time and consideration.

Respectfully submitted,

*Richard A. Fogel*

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cc: Cynthia Bernstiel, Esq., by ECF